

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK : NO: 1:CV-01-0764  
PLAINTIFF :  
 : (JUDGE CALDWELL)  
V. :  
 :  
 :  
MARTIN HORN, ET AL., : JURY TRIAL DEMANDED  
DEFENDANTS :

49  
6/24/02  
rf  
FILED  
HARRISBURG, PA

JUN 21 2002

MARY E. [Signature] CLERK  
Per [Signature] Deputy Clerk

REQUEST FOR PRODUCTION OF DOCUMENTS

TO DEFENDANTS WEXFORD HEALTH SOURCES, INC. AND JOHN SYMONS, M.D.

NOW COMES THE PLAINTIFF, WILLIAM CLARK, PRO SE, AND RESPECTFULLY REQUESTS  
THE FOLLOWING DOCUMENTS:

1) PLEASE PROVIDE ANY AND ALL LABORATORY REPORTS AND ANALYSIS AND  
LABORATORIES USED BY AND/OR COMMISSIONED BY "WEXFORD HEALTH SOURCES, INC."  
FOR ANY AND ALL TESTS AND ANALYSIS OF PLAINTIFF'S SAMPLES AND TO INCLUDE  
THE NAMES AND ADDRESSES, TIMES AND DATES.

RESPONSE:

2) PLEASE PROVIDE AFFIDAVITS PREPARED BY ALL LABORATORIES USED AND/OR  
COMMISSIONED BY "WEXFORD HEALTH SOURCES, INC.", OF ANY AND ALL TESTS USED  
FOR ANALYSIS OF PLAINTIFF'S SAMPLES, AND THE ANALYSIS REPORTS, AND TO SHOW,  
THE DATES AND TIMES OF ANALYSIS, THE SAMPLES ANALYZED, AND TESTS PERFORMED  
BY THOSE LABORATORIES AND TO INCLUDE THE NAMES AND ADDRESSES.

RESPONSE:

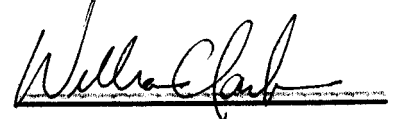
3) PLEASE PROVIDE ANY AND ALL RECORDS PRODUCED BY "WEXFORD HEALTH SOURCES, INC." AND DOCTORS AND EMPLOYEES WHO WERE RESPONSIBLE FOR PLAINTIFF'S "HEALTH CARE" AND TO INCLUDE THE DATES AND TIMES, AND THEIR NAMES AND ADDRESSES. TO INCLUDE:

- A) EACH AND EVERY ENTRY MADE IN MEDICAL RECORD - CONTACT/VISIT OF PLAINTIFF.
- B) CONSULTATION ENTRY
- C) EVALUATION ENTRY
- D) RECOMMENDATION ENTRY
- E) ANY AND ALL DOCUMENTS CREATED BY "WEXFORD HEALTH SOURCES, INC." AND EMPLOYEES.

RESPONSE:

DATE MAILED: JUNE 16, 2002

RESPECTFULLY SUBMITTED:

A handwritten signature in black ink, appearing to read "William Clark", is written over a horizontal line.

WILLIAM CLARK, PRO SE  
BOX A, AY-5585  
BELLEFONTE, PA. 16823

CERTIFICATE OF SERVICE

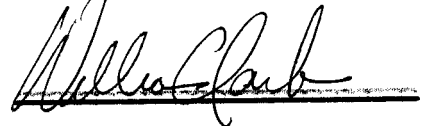
I, WILLIAM CLARK, CERTIFY I HAVE THIS DAY SERVED UPON THE INDICATED PERSON(S) "PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS WEXFORD HEALTH SOURCES, INC. AND JOHN SYMONS, M.D." BY PLACING SAME IN THE UNITED STATES MAIL, POSTAGE PREPAID, ADDRESSED AS FOLLOWS:

JAMES D. YOUNG, ESQ.  
301 MARKET STREET, SUITE 800  
P.O. BOX 1245  
HARRISBURG, PA. 17108-1245

JOHN J. TALABER, ESQ.  
OFFICE OF CHIEF COUNSEL  
55 UTLEY DRIVE  
CAMP HILL, PA. 17011

DATE MAILED: JUNE 16, 2002

RESPECTFULLY SUBMITTED:

A handwritten signature in black ink, appearing to read "William Clark", is written over a horizontal line.

WILLIAM CLARK, PRO SE  
BOX A, AY-5585  
BELLEFONTE, PA. 16823-0820